



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUL - 1 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

EPA WARNING LETTER

Mr. John Massey
Manager
Operations Compliance
Crop Production Services, Inc.
325 S. Oak Street
Spokane, Washington 99201-5654

Re: Risk Management Program Compliance Inspection
Crop Production Services, Rosalia, WA 383
EPA Facility ID# 1000 0002 7213

Dear Mr. Massey:

On June 8, 2016, the U.S. Environmental Protection Agency (EPA) conducted an inspection of the Crop Production Services, Inc. (CPS) facility located at 8602 State Route 271, Rosalia Washington. The purpose of the inspection was to evaluate compliance with Section 112(r) of the Clean Air Act also known as the Risk Management Program (RMP). The RMP inspection was conducted pursuant to the authorities under Section 112(r) and Section 114 of the Clean Air Act. Listed below are the areas of concern identified by EPA:

1. **Hazard Assessment:** CPS failed to use the correct data, or other updated information to estimate the population that would be included in the distance to the endpoint in the RMP based circle with the point of release at the center, as required by 40 C.F.R. § 68.30(a). CPS provided documentation on the population potentially affected that was incorrectly determined using a distance to the endpoint that was miscalculated using urban instead of rural for surrounding terrain type for the worst case scenario.

2. **Safety Information:** CPS failed to provided correct safety information regarding equipment specification of the pressure relief valve sizing for the anhydrous ammonia storage tank as required by 40 C.F.R. § 68.48(a)(4). During the inspection, EPA inspectors observed only one dual pressure relief valve (PRV) manifold that was not sized properly for the anhydrous ammonia storage tank. CPS informed the EPA that they consulted with the MN Department of Agriculture to confirm that the dual PRV manifold only counts as one PRV when calculating the flow rate for an over pressurization scenario. CPS acknowledged that a second dual PRV manifold must be installed per industry standards.
3. **Safety Information:** CPS failed to ensure that the anhydrous ammonia storage process is designed in compliance with recognized and generally accepted engineering practices as required by 40 C.F.R. § 68.48(b). During the inspection, EPA inspectors observed only one dual pressure relief valve (PRV) manifold that was not sized properly for the anhydrous ammonia storage tank. Reference ANSI K.61.1-1999 and CGA G-2.1-2014, Section 5.8.1 and 5.8.6 for pressure relief devices.

Please provide the documentation to substantiate that the areas of concern listed above have been corrected. A copy of the documents must be sent to Javier Morales, RMP Coordinator, within 14 days of your receipt of this letter. The documents may be sent via e-mail, fax or mail.

Javier Morales, RMP Coordinator
U.S. EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, WA 98101
Fax: (206) 553-0124

Please refer to the document *General Risk Management Program Guidance* for additional information pertaining to the areas of concern addressed above. This guidance document can be found on EPA's website at: <http://www.epa.gov/rmp/guidance-facilities-risk-management-programs-rmp>

We urge you to take the steps necessary to address these concerns and to ensure that all aspects of your operation are conducted in accordance with all applicable federal, state, and local requirements. If in the future, additional violations are identified and/or corrections to the identified concerns are not made, EPA may proceed with enforcement action. If you have any questions about the inspection or the Risk Management Program, please contact Javier Morales, RMP Coordinator, at (206) 553-1255 or morales.javier@epa.gov.

Sincerely,



Kelly McFadden, Manager
Pesticides and Toxics Unit